

UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF NEW YORK

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9384-2557 Québec Inc., a Canadian : 1:19-CV-00501-TJM-CFH  
corporation; MINEDMAP, INC., a Nevada  
corporation; and SERENITY ALPHA, LLC, a  
Nevada limited liability, and other similarly  
situated individuals

MOTION FOR EXTENSION OF  
TIME TO RESPOND TO  
MICHAEL CARTER’S MOTION  
TO DISMISS

Plaintiff, :

against : (ECF Case)

NORTHWAY MINING, LLC, a New York limited :  
liability company; MICHAEL MARANDA, an  
individual; MICHAEL CARTER, an individual;  
CSX4236 MOTORCYCLE SALVAGE, LLC, a New  
York limited liability company; DROR SVORAI,  
an individual; MINING POWER GROUP, INC., a  
Florida corporation; HUDSON DATA CENTER,  
INC, a New York Corporation, MICHAEL  
MARANDA, LLC, a New York Limited liability  
company; PORTER KING HILL CONTRACTING,  
LLC, a New York limited liability company;  
COINMINT, LLC, a Delaware limited liability  
company; OSWEGO DATA LLC, a New York  
Limited Liability Company; LORI S. THOMPSON,  
LCSW, PLLC, a professional limited liability  
corporation; LORI S. THOMPSON, an individual,  
ANTHONY PORTER, an individual; and DONALD  
D’AVANZO, an individual

Defendants. :

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Plaintiffs, Serenity Alpha et. al., through counsel, WILLIAMS LLP, pursuant to the Hon. Judge McAvoy Standing Order on Extensions of Time to File Papers in Connection with Motions, seek an Extension of Time up to and including September 24, 2020, to respond to Defendant, Michael Carter's Motion to Dismiss. For good cause, Plaintiffs state that the current posture of this litigation created exigent circumstances for their counsel, T. Edward Williams, Esq., who is in sole practice. During most of the month of August T. Edward Williams was traveling outside of the United States. Also, Plaintiffs' counsel was also engaged in heavy briefing activity in this case relating to several motions now pending before this Court. Further, Plaintiffs' counsel has a two-week trial in another jurisdiction beginning on September 14, 2020, and has been engaged extensively in trial preparation. Plaintiffs therefore seek an extension of time through September 24, 2020, to respond to Michael Carter's Motion to Dismiss. Plaintiffs' counsel has also been engaged in heavy preparation for Plaintiffs' attorney fees and costs hearing also scheduled for September 14, 2020.

Plaintiffs' counsel conferred with Defendants' counsel about this Motion for Extension of Time, but Defendants' counsel did not respond and did not otherwise attempt to resolve the issue raised in this Motion.

Dated this 28<sup>th</sup> day of August 2020.  
New York, New York

RESPECTFULLY SUBMITTED,

WILLIAMS LLP

/s/ T. Edward Williams, Esq.

T. Edward Williams, Esq. Bar No. 5634738

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CERTIFICATE OF SERVICE

I hereby certify that on this 28<sup>th</sup> day of July 2020, this MOTION FOR EXTENSION TO TIME TO RESPOND TO MICHAEL CARTER'S MOTION TO DISMISS was served on the following individuals:

John Harwick, Esq. via ECF  
Benjamin F. Niedl, Esq. via ECF  
Counsel for Maranda Defendants